

MEMO ENDORSED

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November 30, 2021

VIA ECF

Hon. Kenneth M. Karas United States District Court Southern District of New York United States Courthouse 300 Quarropas Street White Plains, NY 10601

Re: United States v. Darren Lindsay, et al. (Indigo Grant), 21-cr-441-6 (KMK)

Dear Judge Karas:

We represent defendant Indigo Grant in the above-referenced matter. We write to respectfully request modification of Ms. Grant's bail conditions such that her curfew will be "as determined by PTS." Currently, Ms. Grant's bond provides that her curfew is from 7p.m. to 7a.m., (see ECF Doc. 6 at 4), which makes it difficult for her to regularly take her children to after school activities and attend to her business events.

I have discussed this proposed modification with the government (AUSA Bradley) and Pretrial Services (Officer Barrios) who do not object to this request.

Granted.

/s/ IH

Henry E. Mazurek

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Respectfully submitted,

New York, New York 10017

Counsel for Defendant Indigo Grant

cc: Couns

Counsel of record (via ECF)
Pretrial Services (via email)